Preliminary Assessment
Mound Street Power Plant
St. Louis, Missouri
TDD #F-07-8708-29 PAN #FM00579PA
Site #Y33 Project #001

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SECTION 1: INTRODUCTION

The Ecology and Environment, Inc., Field Investigation Team (E & E/FIT) was tasked by the Region VII U.S. Environmental Protection Agency under Technical Directive Document (TDD) #F-07-8708-29, to conduct a Preliminary Assessment (PA) of the former Mound Street power plant, located in St. Louis, Missouri. This (PA) request was prompted by reports of oil accumulation in the facility and occasional oil releases to the Mississippi River. This preliminary assessment report will focus on potential chemical hazards associated with the current facility, and past operations on-site. E & E/FIT members Eric Hess and Kevin Hugill visited this site on September 17, 1987, to perform a site reconnaissance. In addition, oil samples were taken and analyzed for PCB contamination. EPA Preliminary Assessment Form 2070-12 is included as Appendix A.

SECTION 2: SITE DESCRIPTION AND HISTORY

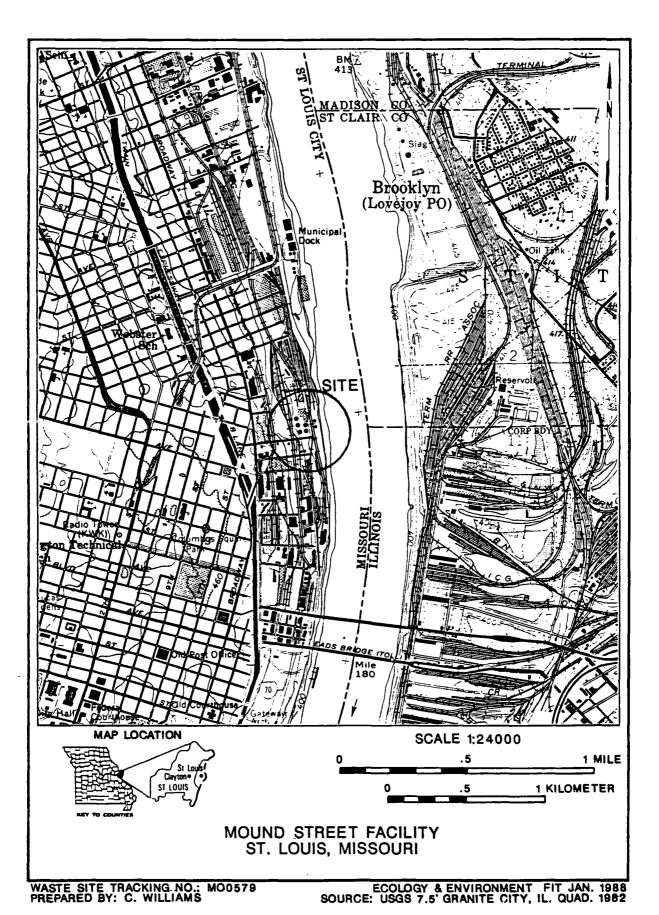
2.1 SITE DESCRIPTION

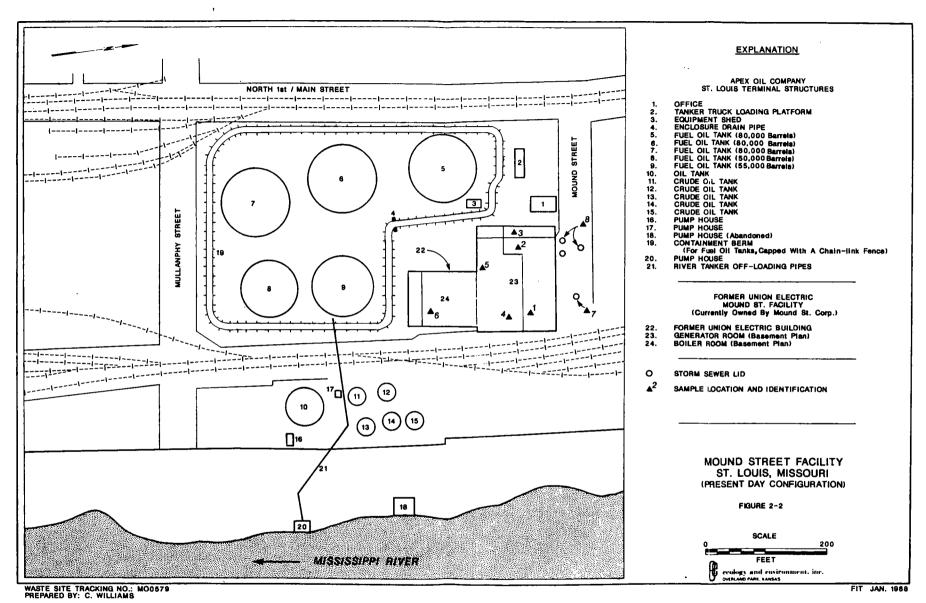
The Mound Street Power Plant is located in St. Louis, Missouri, approximately 1 mile north of the St. Louis Arch, along the Mississippi River (Ref. 1). The legal description of the power plant is city block 234-Tract #25, St. Louis Plan. The geographic coordinates of the site are 90° 11′ 00".0 east longitude, and 38° 38′ 30".00 north latitude (Figure 2-1). The facility is located in an industrial area adjacent to the river. Several large warehouses, a petroleum tank farm, and a large grain storage facility are all located within 1/4 mile of the facility. The tank farm is adjacent to the power plant, and the two facilities separated by several yards of paved road. Currently the site is occupied by the former Mound St. Power Plant building, and the Apex Oil Company St. Louis terminal (Figure 2-2). The site is not secured and access to the grounds buildings is relatively unrestricted. There are locks on most doors and a fence surrounds the petroleum storage tanks, no other security exists.

2.2 SITE HISTORY

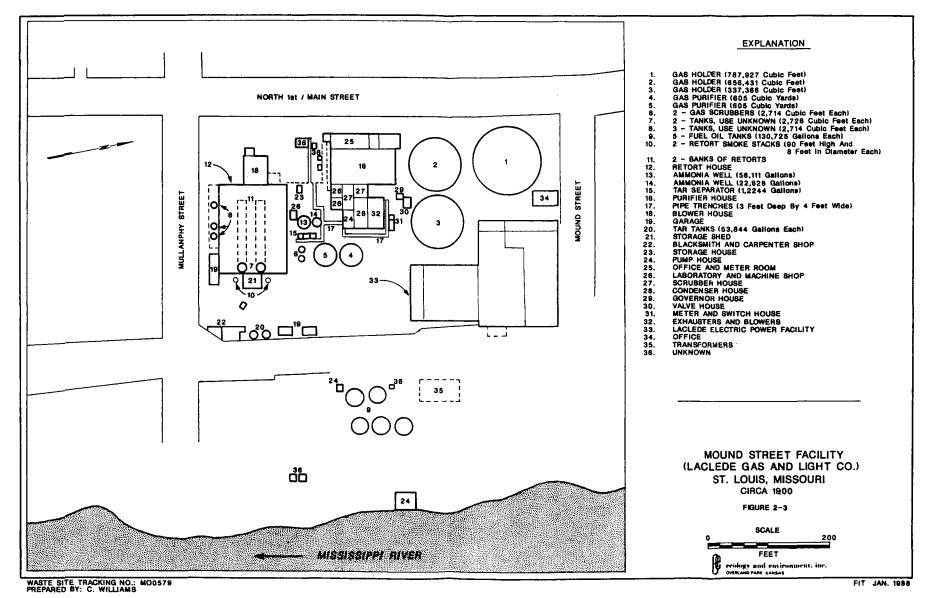
The purpose of this section is to convey the close association between the current Mound Street Power Plant and the former coal gasification facility once located on this site. The two facilities should be considered one site.

The earliest property records available indicate that this parcel of land was used by the Mound Street Warehouse Corporation until February 8, 1888 (Ref. 2). The Mound Street Warehouse Corporation sold the land and buildings to the Laclede Gas Light Company on February 8, 1888. The Laclede Company proceeded to construct a large coal gasification facility on the property. Figure 2-3 shows the Laclede Gas Facility at the turn of the century. Later, before 1904, the Laclede Company built an





2-3



electric power plant on the facility. This facility provided all the electric and gas power for the 1904 St. Louis Worlds Fair. On March 23, 1940, the name of the facility was changed to the Laclede Power and Light Corporation (aka Laclede Electric), and the Laclede Gas Light Company (aka Laclede Gas). This suggest that the operations were separated, at least financially. At some time between 1940 and 1945 a company called Phoenix Light, Heat and Power was involved in the Laclede The exact nature of their involvement was not uncovered operations. during the present document search. On March 23, 1945, the entire facility was sold to Union Electric Company. According to Union Electric representatives, Union Electric Company never manufactured gas at this site (Ref. 3). This indicates that 1945 is the approximate closure date of the coal gasification works. Union Electric continued to use electric power facility until 1973. In 1969 Union Electric sold former coal gas works to the Apex Oil Company. Between 1969 and 1972 Apex Oil dismantled the old coal gas plant and constructed a petroleum tank farm on the site. This Apex facility stored various petroleum fuels until the mid 1980s when it became one of two Apex Oil asphalt product terminals in St. Louis. Currently the terminal stores and distributes asphalt and #6 fuel oil.

On August 15, 1973, Union Electric sold the electric power plant with, all its machinery intact and operational to the Tenlis Company. The Tenlis Company dismantled the power generation and transmission equipment, including boilers, generators, and transformers. The transformer oil was allegedly removed by Midwest Oil Company, of St. Louis, Missouri (Ref. 3). The equipment was sold as scrap metal. On August 17, 1981, the Tenlis Company sold the former electric works to Azcon Corporation. The Azcon Corporation may be connected with metal recycling. On October 22, 1985, Azon Corporation sold the former electric works to the Mound Street Corporation, the present site owner. Currently the building is leased by Jim McNabb, who uses the buildings to house his electric motor stripping operation.

2.3 LACLEDE COAL GASIFICATION OPERATIONS

The Laclede coal gas facility operated for almost 60 years. An estimated production schedule for this facility is listed in Table 2-1. It should be noted that this facility was over 10 times larger, in terms of production, than the Key City facility in Dubuque, Iowa. Therefore, the Laclede facility may be the largest coal gasification plant in Region VII

Table 2-1
Estimated Production Record for the
Laclede Coal Gas Plant
St. Louis, Missouri

~			odyction F	Rate			By-Pro (10 ³ g	ducts (allons)	
Year	Gas Type	Coal	Water	Coke	Total	Coke	Tar	Ammonia	Other
1890	Coal	1,000			1,000				
1900	Coal	1,200			1,200				
1910	Coal, Water	1,200	2,800		4,000				
1920									
1930	Coal, Water, Coke	1,692	2,323	2,022	6,037	337	4,355	2,789	821,17* lbs sulfate
1940 1950	Coke Coke			•	1,969 1,338				
AVERAC	GES:	1,273	2,562	1,776	2,591	337	4,355	2,789	
-=====		======	*******	.======:		=====	======	======	*=====

(Ref. 4)
* Sold to the U.S. Army for munition manufacture.

In the 19th century and the first half on the 20th century, natural gas substitutes were manufactured from coal and petroleum oils. These products were distributed for a variety of residential, commercial, and industrial uses. The diverse uses of manufactured gas included the operation of home appliances, lighting, furnaces, and internal combustion engines.

Because distribution technologies of the era were limited, manufactured gas plants were situated near areas of high demand, usually major metropolitan centers. In the late 1950s, these facilities were phased-out as petroleum and natural gas pipeline distribution facilities became widely established. Natural gas is a more convenient and economical form of energy. Many manufactured gas facilities were sold or destroyed to make way for new construction. Generally, the waste containers were left underground and in some cases were covered by new construction. Approximately 1,500 manufactured gas sites have been identified in the United States. EPA Region VII has approximately 142 coal gasification sites (Ref. 4).

The major gas manufacturing process used was the UGI intermittent retort process (Ref. 5). This method produced gas through coal carbonization (Figure 2-4). During this process, coal is heated in the retort and the resulting coal gas is removed through its top. The gas is run through a condenser and a scrubber before it is moved into the gas holder. Wastes are produced in the condenser and scrubber and in the retort itself. The coal is carbonized in batches and the resulting coke is discharged after each period of carbonization. In the latter stage of a carbonization period, steam can be introduced into the fuel bed. This displaces residual coal gas and reacts with the hot coke to produce water gas. The resulting increase in gas production is substantial. The majority of manufactured gas in the United States was produced by this process.

This manufactured gas is often called city gas, coal gas, or town gas. It is relatively rich in hydrogen, methane, and carbon monoxide, and exhibits a heating value of about 500 British thermal units/per cubic foot (Btu/cf) (Ref. 5). The coke produced by this process is highly reactive and an excellent smokeless fuel for domestic heating.

A second type of retort process is the continuous retort. It features a continuous fuel feed system and a continuous discharge of coke. An analysis of typical retort gas is listed in Table 2-2.

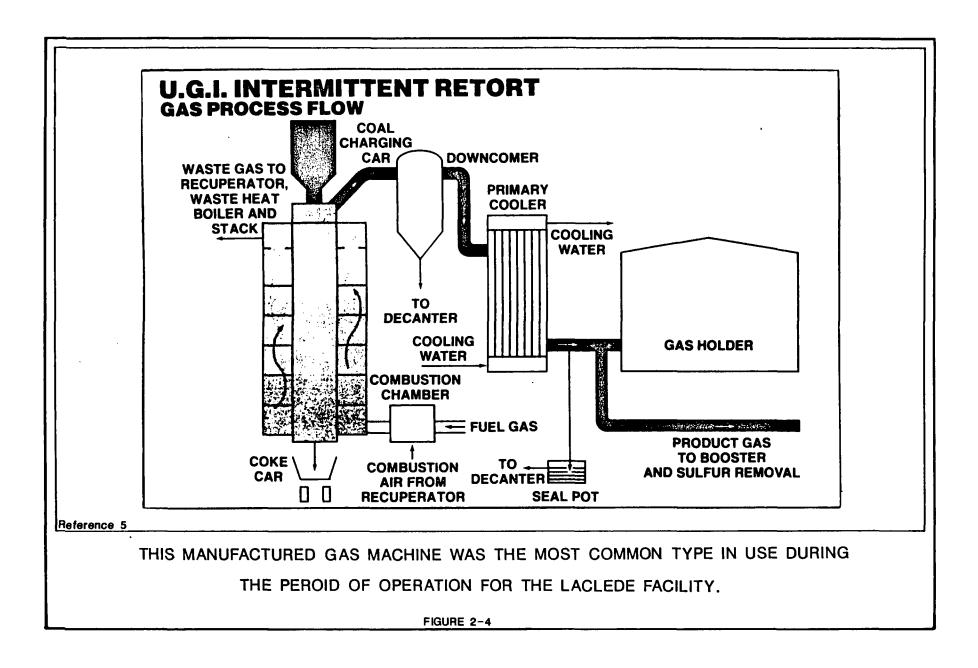


Table 2-2 Chemical Composition of Typical Retort Gas

 Volume Percent in Various Gases

 Intermittent
 Continuous

 Carbon Dioxide
 2.1
 3.0

 Illuminants
 3.4
 2.8

 Oxygen
 0.4
 0.2

 Carbon Monoxide
 13.5
 10.9

51.9

24.3

4.4

0.42

520.0

54.5

24.2

4.4

0.42

532.0

Source: Ref. 5

Specific Gravity

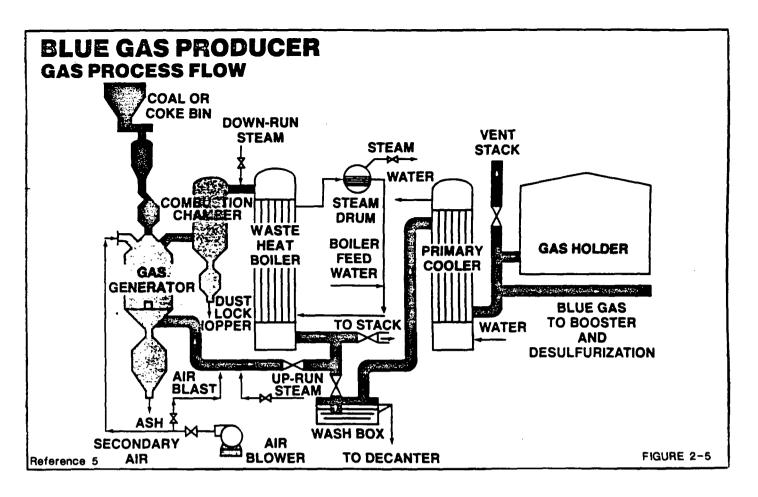
Hydrogen

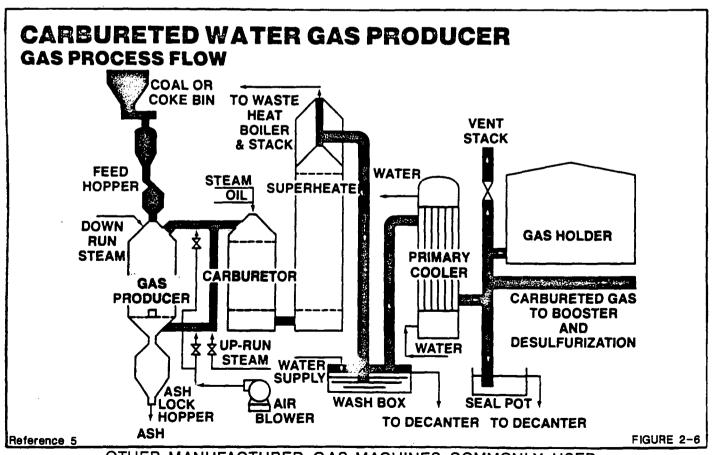
Methane

Nitrogen

Btu/cf

Another type of manufactured gas is known as blue gas or water gas. This gas is rich in hydrogen and carbon monoxide and exhibits a heating value of approximately 300 Btu/cf (Ref. 5). This product is produced by passing steam over incandescent coal or coke in a gas generator (Figure 2-5). The resulting chemical reaction is endothermic and thus is maintained by periodically forcing air into the coal or coke beds, allowing it to combust at a controlled temperature. To avoid contaminating the blue gas with excessive nitrogen or carbon dioxide, the steam and combustion phases are cycled. A chemical analysis of a typical blue gas is listed in Table 2-3.





OTHER MANUFACTURED GAS MACHINES COMMONLY USED

DURING THE MANUFACTURED GAS ERA, 1890-1950.

Table 2-3 Chemical Composition of a Typical Blue Gas

	Volume Percent of Various Gases
Carbon Dioxide	5.5
Carbon Monoxide	37.3
Hydrogen	47.6
Methane	1.2
Nitrogen	8.4
Btu/cf	287
Specific Gravity	0.57
=======================================	

Source: Ref. 5

Blue gas may be enriched by cracking petroleum oil in the presence of blue gas and steam. This forms carbureted water gas (Figure 2-6). Through the proper manipulation of the oil injection, it is possible to produce a carbureted water gas with a heating value of over 1,000 Btu/cf. Analyses of typical carbureted water gases of varying heating values can be seen in Table 2-4.

Table 2-4
Chemical Composition of Typical Carbureted Water Gas

		Volume Per	cent of Var	ious Gases
Carbon Dioxide	3.4	4.3	1.6	4.4
Illuminants	8.4	12.6	18.9	27.4
0xygen	1.2	0.7	0.2	1.1
Carbon Monoxide	30.0	30.2	21.3	9.1
Hydrogen	31.7	29.3	28.0	19.9
Methane	12.2	17.8	20.7	21.8
Ethane	0.0	0.0	4.3	5.3
Propane	0.0	0.0	0.0	0.3
Nitrogen	13.1	5.1	5.0	10.7
Btu/cf	540	695	85 0	1010

Source: Ref. 5

The manufacturing capacity of a gasification plant is determined by the size of the gas generator or retort, the type and size of fuel used, and the rate of air and steam injection. A standard gas generator, with a 9-foot inside diameter, can produce about 6 million cubic feet (ft³) of blue gas per day. This is equivalent to almost 4,000 ft³ of blue gas per square foot of gas generator per hour (Ref. 5). A retort can produce up to 15,000 ft³ of gas per ton of coal (Ref. 6).

A conventional carbureted water gas apparatus consists of four shells: the gas generator, carburetor, superheater, and purifier (wash box) (Figure 2-6). The gas generator produces the blue gas. The blue gas is passed into a carburetor where petroleum oil is sprayed into it, producing an oil gas. This mixture is passed through the superheater where the oil vapors are converted into more simple gases. These gases are directed to a wash box for cooling, where the tars (coal tars) condense in the wash box. Unwanted constituents such as hydrogen sulfide $(\mathrm{H}^-_2\mathrm{S})$ also are removed at this stage. As the carburetion process is expanded, increasing the Btu/cf of the product, the production capacity of the plant is reduced.

The disposition of the by-products of the major gasification processes is presented in Table 2-5.

Table 2-5
Common By-Product Disposition
for the Average Coal Gasification Facility

	Percent of Total Pr	coduced*					
By-Product	Sold Unac	counted for					
Tar	76	24					
Coke	62	38					
Ammonia	N.D.	N.D.					
Naphthalene, Crude	46	54					
Crude Light Oil	26	74					
Light Oil Derivatives	55	46					
Screenings and Breeze	13	87					
Spent Iron Oxide	N.D.	N.D.					
Spent Lime	N.D.	N.D.					

^{* =} Based on averages from 1925, 1927, 1929, and 1931.

N.D. = No Data.

⁽Ref. 4)

2.4 PAST INVESTIGATIVE ACTIVITIES

Cynthia Dillion, Marine Safety Officer-United States Coast Guard, traced the initial Coast Guard involvement with this site to 1975 (Ref. 7). Since 1976 the Coast Guard has been requested to investigate three separate oil slicks on the Mississippi River, possibly originating from the former electric power facility. Although records are not complete, it appears that the oil problem in the basement of the former electric power plant was a suspected source of these oil spills. Dillion claims that the Region VII EPA was notified of this problem in 1975. The Coast Guard never sampled the oil.

On April 8, 1987, the St. Louis Division of Health sampled the oil in the basement of the former electric power plant. Daniel Wilson, Environmental Sanitation Specialist, conducted the sampling effort. Six samples were collected and analyzed for PCB. None of the samples showed PCB contamination, although no listing of the detection limits were included on the data transmittal.

On September 17, 1987, the E & E/FIT conducted a site reconnaissance of the former electric power plant. The E & E/FIT took six liquid samples from the basement of the facility and two samples from two different manholes adjacent to the facility (Figure 2-2). All samples were screened for PCBs at a 1 ppm detection limit. No PCB contaminants were identified by the Tracor gas chromatograph. Sample #1 was taken from a pool of oil/water 6 inches to 2 feet deep. Sample #2 was taken from a pool of apparently pure oil, over 6 feet deep. Sample #3 was taken from another pool of apparently pure oil, over 6 feet deep. Sample #4 was taken from a bucket of thick oil/sludge. Sample #5 was taken from a pool of oil/water over 6 feet deep. Sample #6 was taken from a pool of clear water over 8 feet deep. Samples #7 and #8 were taken from manholes containing oil/water mixtures. All samples were collected with 1/2 inch thieving rods. Samples taken from basement locations were collected in level B personal protection while conducting initial on-site monitoring. No HNu readings above background were recorded. Oxygen levels in the basement averaged 19.8%. The MSA combination 0₂/explosimeter did not indicate an explosive atmosphere.

2.5 ATTRIBUTION OF OIL CONTAMINATION IN BASEMENT

Jim McNabb, manager of operations in the power plant claims that the Apex Oil terminal has had numerous oil spills, some of which have lead to the flooding of the power plant basement (Ref. 3). McNabb claims the largest spill occurred in 1981 when a flow, several feet deep, was released down Mound Street. McNabb indicated that the large transformers associated with the power plant were drained by the Tenlis Company, and removed by the Midwest Oil Company. Midwest Oil Company could not confirm or deny this fact, due to the lack of records from the early 1970s.

Tom Kniestedt, Apex Oil Company, denied that the terminal has had any major spills (Ref. 3). Rather, he indicated that the loading platform on the river has been the source of several spills. This may explain the three spills noted by the Coast Guard. Kniestedt said that the Tenlis Company drained the transformers and hydraulic oil tanks into the basement.

Herman Gellman, current president of the Mound Street Corporation, supported McNabb's statements. Gellman, as McNabb, has been associated with this site for the past fifteen years.

Based on the interviews and the sample analysis, the most likely source of the oil in the power plant basement is from spills at the Apex Oil Terminal.

2.6 SITE CONTACTS

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SECTION 3: WASTE CHARACTERISTICS

3.1 GENERAL WASTE STREAMS FOR COAL GAS SITES

The two waste products of primary concern are tar sludges (coal tars) and spent oxides. Ammonia wastes are also by-products of this production process, but are not considered hazardous. Coal tar wastes are primarily polynuclear aromatic hydrocarbons (PAHs) and phenolics produced during coal or coke combustion and during the oil injection process (Figure 3-1). Spent iron oxide wastes are produced during the gas purification process where impurities are removed from the manufactured gas. Iron oxide wastes contain sulfur compounds, cyanide compounds, and small quantities of coal tar. Light aromatics such as benzene, toluene, and xylene (volatile organic compounds) also are occasional constituents of coal tar wastes (Figure 3-1). For this study, volatile organics analysis was not requested.

Coal tars are removed from the gas in the wash box and condenser. These tars are also present in the oxide wastes. These wastes could either be sold or disposed of in pits or holding tanks. Coal tar can also be used as wood preservatives, road treatments, herbicides, or sold to coal tar refineries for further processing.

Some of the PAH compounds likely to be present in the tar wastes are carcinogenic and are listed as RCRA Part 261 hazardous wastes. All PAHs can be considered as carcinogenic as benzo(a)pyrene, a Class A carcinogen (Ref. 8). The carcinogenic potential of PAHs can be assessed through a determination of total PAH concentrations (summation of the concentrations of all PAHs detected in a given sample). Drinking water standards for PAHs are incomplete.

Iron oxide wastes are produced when manufactured gas is passed through a bed of active hydrated iron oxide. The active hydrated iron oxide is usually carried on small wood chips or corncobs. This process

	Component	Formula	Structure	Boiling Point, C
	Benzene	C ₆ H ₆	© ,	80
	Toluene	C ₇ H ₈	, ©	111
	Xylenes	C ₈ H ₁₀	⊕ ••	138-144
	Phenoi	C6H5OH	(181
	Cresols	C ₇ H ₇ OH	• • • • • • • • • • • • • • • • • • •	191 - 202
	Xylenols	C8H90H	@ -	201 - 227
_ ا	Pyridine	C _S H _S N	Ø	115
	Naphthal ene	C ₁₀ H ₈	©	218
	Methylnaphthalenes	C11H10	-	241-245
	Dimethylnaphthalenes	C ₁₂ H ₁₂	-	262-269
	Acenaphthene	C ₁₂ H ₁₀		277
	Carbazole	C ₁₂ H ₉ N	© ,,©	355
	Fluorene	C ₁₃ H ₁₀	©	297
	Anthracene	C ₁₄ H ₁₀	0000	340
PAH COMPOUNDS	Phenanthrene	C ₁₄ H ₁₀	60 a	340
l og	Fluoranthene	C ₁₆ H ₁₀		393
ŏ	Pyrene	C ₁₆ H ₁₀		394
1	Chrysene	C ₁₈ H ₁₂		436
A	Benz(a)anthracene	C ₁₈ H ₁₂	©©© 6 6	438
	Benzo(j)fluoranthene	C ₂₀ H ₁₂	<u> </u>	~480
	Benzo(k)fluoranthene	C ₂₀ H ₁₂	66 <u>0</u> 0 66	480
	Benzo(a)pyrene	C ₂₀ H ₁₂	66	496
	Benzo(e)pyrene	C ₂₀ H ₁₂		493
	Perylene	C ₂₀ H ₁₂		460
	Benzo(g,h,i)perylene	C ₂₂ !1 ₁₂		. 500
	Benzo(b)chrysene	C ₂₂ H ₁₄	2 0000	~ 500
	Dibenz(a,h)anthracene	C ₂₂ II ₁₄		-

Reference 5

Chemical Compounds Associated with Coal Gasification

FIGURE 3-1

filters impurities from the raw manufactured gas. The spend oxide can be regenerated by contact with ambient air. It can be reused until tar accumulation and reaction with cyanide, which produces ferrocyanides, causes it to lose activity. The spend oxide waste is usually blue-gray in color, due to the presence of ferrocyanide salts (Ref. 5). Table 3-1 gives an analysis of typical spent iron oxide waste.

Table 3-1
An Analysis of Typical Spent Oxides

		Percent
Free Sulfur		44.70
Moisture		17.88
Ferric monohydrate		5.26
Ferrous monohydrate		6.25
Basic ferric sulfate		1.25
Ferric ammonium ferrocyanide		3.80
Ferrosoferric ammonium ferrocyanide		2.50
Ferric pyridic ferocyanide		1.20
Organic matter peat fiber		4.68
Tar		1.21
Silica		1.05
Naphthalene		0.72
Pyridine sulfate		0.77
Ammonium sulfate		2.06
Calcium sulfate		0.12
Ferrous sulfate		0.02
Ammonium thiocyanate		1.30
Sulfur otherwise combined		1.33
Organic matter soluble in alkalies (humus)		1.54
Combined water and loss (by difference)	TOTAL	$\frac{2.36}{100.00}$

Source: Ref. 5

3.2 ENVIRONMENTAL FATE OF COAL GASIFICATION WASTES

PAH and phenolic compounds may enter the atmosphere through volatilization. Once in this matrix, the materials may undergo molecular or advective diffusion. (All further references to dispersion characteristics will infer both molecular and advective processes). PAH compounds are likely to undergo dispersion when introduced into surface water. If this occurs, the contaminants are very susceptible to adsorption onto clay particles suspended in the water. Depending on the nature of the surface water, this material may also volatilize; thus entering the atmosphere. Once in the surface water the PAH compounds are prone to chemical alteration through biodegradation or photolysis. Phenolic compounds are likely to undergo dispersion in surface water. They are not readily absorbed to clay particles. These compounds may also undergo volatilization and limited biodegradation in surface water.

PAHs in ground water are also likely to undergo dispersion and adsorption processes. Biodergradation of these materials is unlikely, however, in this matrix (Ref. 5). Phenolic compounds in ground water can be transported through dispersion. It is possible that these chemicals may undergo limited biodegradation in ground water environments (Ref. 5).

In the soil matrix, PAHs can be involved in adsorption processes as well as biodegradation reactions. These materials may also undergo volatilization, leaching, and photolysis depending on site-specific characteristics. Phenolic compounds in the soil environment can be leached readily or removed through biodegradation (Ref. 5).

PAH compounds are stable and tend to be retained in sediments. The specific stability of a particular PAH compound is dependent on its chemical structure (Ref. 8 and 5). Generally the stability/solubility is inversely related to the molecular weight of the PAH (Figure 3-1). The arrangement of rings is also important. For example, anthracene is relatively soluble. It is a medium mass PAH composed of three linear rings. The arrangement of the rings allow this relatively massive molecule to be soluble. Benzo(a)pyrene is composed of a single ring surrounded by rings on three sides of its six sides. It is one of the more massive PAHs.

This material is more stable than anthracene, the most soluble PAH. When the rings become arranged in a step-wise fashion, they are members of the most stable PAH group. An example of this is chrysene. The basic structures of the major PAHs are found in Figure 3-1.

PAH compounds are produced by both natural and man-made processes, including most combustion events. Coal tar products are composed primarily of PAH and phenolics; petroleum products may contain trace amounts of these materials. Removal of PAH materials through volatilization is not believed to be significant. Adsorption of PAHs onto soil particles is an important barrier to transport. This process depends on the physical/chemical properties of both soil and the transported material: characteristics of the chemical itself, soil moisture, temperature, availability of exchange sites on the soil particles, and pH. All PAH compounds except napthalene are strongly adsorbed onto soil particles. PAHs may undergo microbial degradation, particularly the more water soluble and lighter compounds. For example, napthalene is readily oxidized by Pseudomonas (Ref. 5).

Phenolic compounds are generally highly water soluble (in excess of 10,000 mg/l) and have low vapor pressures (Ref. 5). The low vapor pressure reduces the tendency for this material to volatilize. Phenolics are produced through both man-made and natural processes, including coal tar production, oil and chemical refinery processes, gray iron foundry operations, human/livestock wastes, and the decay of organic matter. Typical soil background levels of phenolics can range from 0.10 to 0.50 mg/l (Ref. 5). Phenolics are not absorbed by mineral particles, and their affinity for adsorption onto organic matter is limited. The adsorption of these constituents in the soil matrix is directly proportional to the abundance of organic matter in the soil. Biodegradation of phenolics is common, although high concentrations may temporarily repress the process. An example of a bacteria that can metabolize phenolics is Pseudomonas putida (Ref. 5).

Two types of cyanide may be present at a coal gasification site: simple and complex cyanides. Simple cyanides are formed when cyanide reacts with an alkali or metal, producing a soluble material that can liberate a CN⁻ anion in water. Simple cyanides can be decomposed by bacteria in the soil (Ref. 5). Complex cyanides are alkali-metal cyanides that are relatively insoluble (Ref. 5). Complex cyanides, particularly the ferrocyanide compounds, are more resistant to biodegradation. These materials are associated with oxide wastes.

The trace metals most likely to be found on a coal gasification site are: arsenic, chromium, copper, iron, lead, nickel, and zinc (Ref. 5). All are readily adsorbed onto soil particles. The mobility of these constituents is controlled by the pH of the soil. As a general rule, the solubility of these metals increases as pH decreases. Low pH values also reduce the cation exchange capacity of the soil matrix due to the preferential adsorption of H⁺ ions. Cation exchange is generally considered the major barrier to metals transport in soils. The strong tendency of metals to be bound to soil particles and organic matter limits their impact on ground water resources.

The migration of coal tar in ground water has been observed in several former coal gas manufacturing sites (Ref. 5 and 9). Coal tar is more dense than water and tends to migrate downward through porous material to a confining layer of less porous material. In areas where this behavior is exhibited, the following stratification (from top to bottom) may be expected: ground water with dissolved organics; ground water with trapped coal tar; and, below the confining layer, ground water with dissolved organics (Ref. 5).

3.3 GENERAL WASTE STREAMS ASSOCIATED WITH ELECTRIC POWER GENERATION AND FUEL STORAGE

Waste products of primary concern are polychlorinated biphenyls (PCB). Commercial petroleum products such as diesel and heating oil are not considered hazardous under RCRA, 40 CFR 261.

A PCB is any one of 209 compounds with the general chemical formula ${\rm C_{12}H_xCl_x}$. PCB are produced by chlorinating available biphenyl compounds and the different structural arrangements make possible 209 compounds distributed among the 10 levels of chlorination (Table 3-2, Ref. 10). Commercial PCB are produced by distilling chlorinated biphenyl mixtures. The name Aroclor is frequently used interchangeably with the term PCB, though not all PCBs are Aroclors.

PCBs are commonly found in transformers, power capacitors, hydraulic fluids, diffusion pump oil, and other heat transfer applications. Since 1971, the use of PCBs in the United States has been limited to the manufacture of transformers and high voltage capacitors. As of 1975, no substitute for the high dielectric and heat resistance properties and the non-flammable characteristics of PCBs was available (Ref. 11). In 1979, Congress banned the manufacture, processing, distribution, and use of PCBs except in completely enclosed systems such as electric transformers, capacitors, and electromagnets. Since this ban, various regulations have attempted to control further distribution of PCBs, including PCB that is incidentally generated along with some other desired product (Ref. 10).

The toxic effects of PCBs range from death in the lower invertebrates, to physiological disturbances in primates and humans (Ref. 11). PCBs in conjunction with other chemicals combine synergistically to increase risks of cancer at a much lower concentration than either chemical exhibits alone. PCB compounds are classified as human suspect carcinogenic, and are toxic substances regulated under the Toxic Substance Control Act (TSCA).

3.4 ENVIRONMENTAL FATE OF PCBs

PCBs are chlorinated aromatic organic compounds. They are very stable and cannot be decomposed by bacterial, enzymic, or any other biological or environmental activity. The PCB half-life is not known. Solubility in water is very low and depends on the amount of chlorination. As the percentage of chlorination in the moleule increases, the solubility decreases. PCB are very soluble in fats, and thus, they tend to accumulate in adipose tissue. The listed water quality criteria for PCB in fresh water and marine ecosytems is 0.001 ppb (Ref. 12).

PCBs can be extracted from water solutions using hexane. It can be absorbed from solutions or vapors by activated charcoal or polymeric resins (Amberlite XAD-4 or XAD-7). A common method of destroying the PCB molecule is through the use of special industrial furnaces. The decomposition of this class of molecules occurs at 24000° F.

	=======================================	
Isomer Group	Molecular Formula	No. of Compounds
Monochlorobiphenyls	C ₁₂ H ₉ Cl	3
Dichlorobiphenyls	$c_{12}H_8cl_2$	12
Trichlorobiphenyls	с ₁₂ н ₇ с1 ₃	24
Tetrachlorobiphenyls	^C 12 ^H 6 ^{Cl} 4	42
Pentachlorobiphenyls	с ₁₂ н ₅ с1 ₅	46
Hexachlorobiphenyls	^C 12 ^H 4 ^{Cl} 6	42
Heptachlorobiphenyls	$^{\text{C}}_{12}^{\text{H}}_{3}^{\text{Cl}}_{7}$	24
Octachlorobiphenyls	$^{\mathrm{C}}_{12}^{\mathrm{H}}_{2}^{\mathrm{Cl}}_{8}$	12
Nonachlorobiphenyls	C ₁₂ HHCl ₉	3
Decachlorobiphenyl	c ₁₂ c1 ₁₀	1
TOTAL NUMBER OF CONGENERS		209

Ref. 10

SECTION 4: PHYSICAL SETTING

4.1 TOPOGRAPHY AND DRAINAGE

The site topography is essentially flat with a very gentle slope (0 to 3 percent) to the east. Locally the slope has been modified around buildings and other facilities.

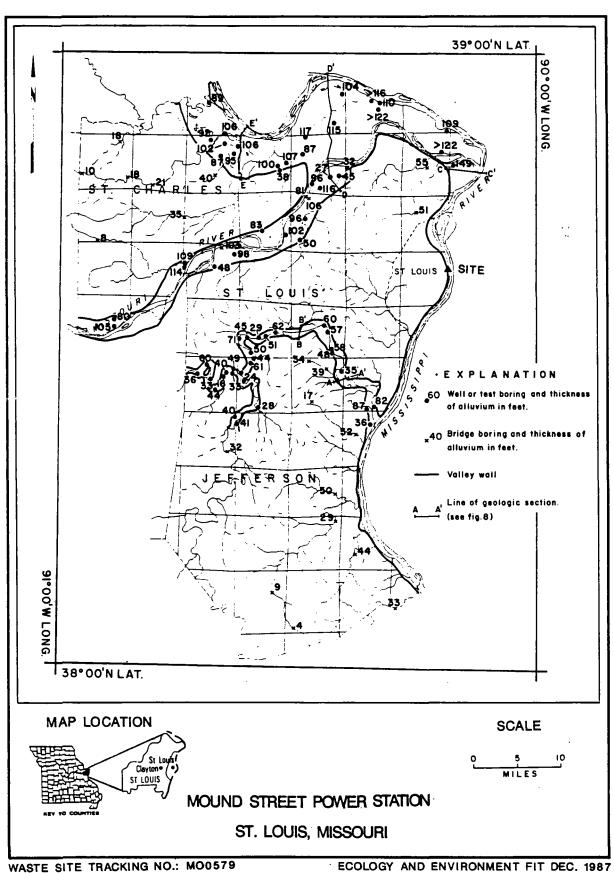
Surface drainage flows to the east directly into the Mississippi River. The site is protected from flooding by the U.S. Corps of Engineer concrete levee wall (Ref. 3).

4.2 SOILS AND STRATIGRAPHY

The soils in the area belong to the Harvester, Fishpot and Urban Land associations. These soils are classified as fine loams to fine silty clay loams. On site, the soils belong to the Urban Land, bottom land unit. This unit consists of areas in which more than 85 percent of the surface is covered by asphalt, concrete, buildings, or other impervious material.

The area was originally bottom land which was built-up to protect the site from flooding. The amount of fill in the area can range from 0 to over 200 feet. Variability of the soils in the area makes identification impractical without a detailed on-site investigation (Ref. 13). Figure 4-1 depicts the thickness of the alluvium along the Missouri, Mississippi, and Meramac rivers in St. Louis County.

The bedrock stratigraphy beneath the site belongs to the upper Mississippian and lower Pennsylvanian systems, which are roughly 286 to 360 million years old. Figure 4-2 shows that these systems are subdivided, in descending order, into the Pleasanton, Marmaton and Cherokee groups of the Pennsylvanian System, and the Mermacian series of the Mississippian System (Ref. 14).



PREPARED BY: JOHN C. PARKS

ECOLOGY AND ENVIRONMENT FIT DEC. 1987
SOURCE: WATER RESOURCES ST. LOUISAREA MISSOURI

FIGURE 4-1: ALLUVIUM THICKNESS ALONG THE MISSOURI, MISSISSIPPI AND MERAMEC RIVERS ST. LOUIS COUNTY MISSOURI

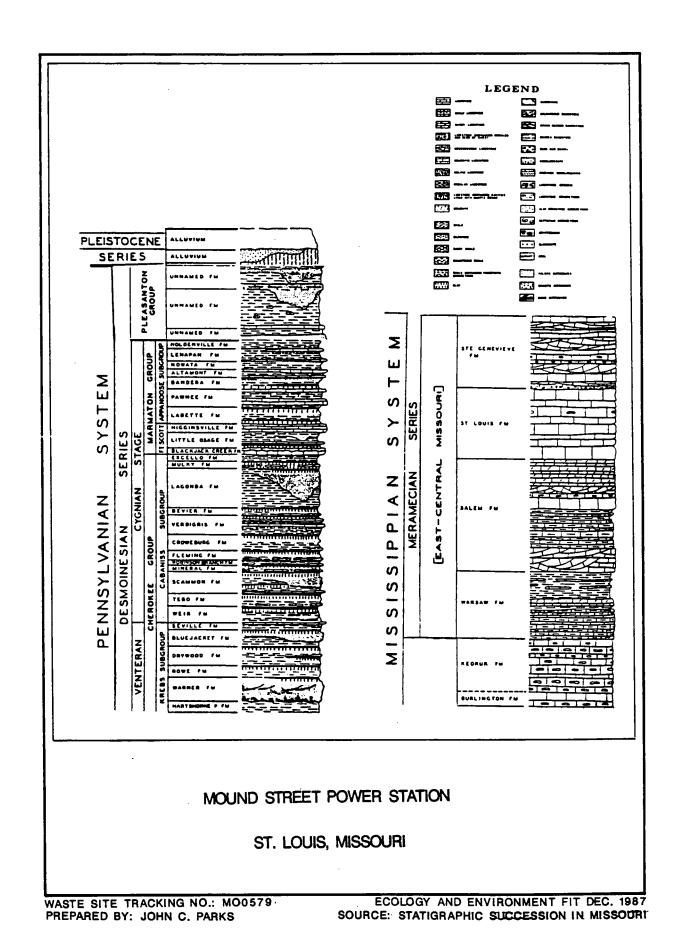


FIGURE 4-2; GENERALIZED STRATIGRAPHIC SECTION ST.LOUIS COUNTY, MISSOURI

The Mermacian Series contains the following formations: Warsaw, Salem, St. Louis, and Ste. Genevieve. The predominant rock type is a finely crystalline, sometimes fossiliferous limestone with some dolomite. This series displays a typical cyclothemic succession (transgressive/regressive limestones with interbedded shales) though not necessarily a complete one. Chert is a very common accessory in the upper portions of the series (Ref. 14).

The overlying Pennsylvanian deposits are predominantly clastic in origin. However, numerous limestone, coal and shale beds occur. The lower groups (Cherokee and Marmation) have formal subdivisions while the Pleasanton consists of undifferentiated shales, siltstones, sandstones, coal, and, to a lesser degree, limestone (Ref. 14).

The specific stratigraphy beneath the site can be inferred from regional data. However, for more accurate information a more in depth, site specific geologic study would be useful.

4.3 HYDROGEOLOGY/WATER RESOURCES

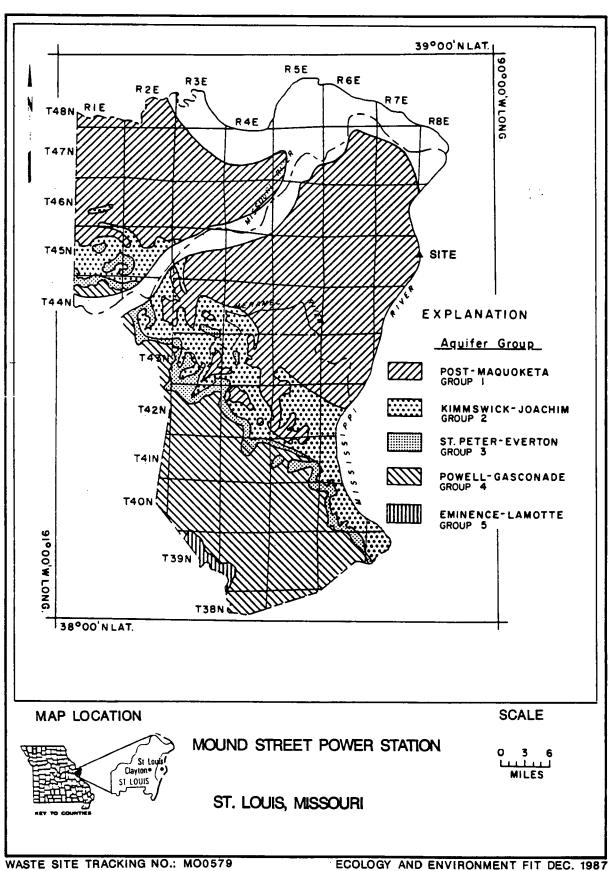
The water needs of the city and surrounding community are met primarily through the withdrawal of surface water from the Missouri, Mississippi, and Meramac rivers. The municipal water intakes for the city of St. Louis and surrounding communities are approximately 9 miles upstream from the site (Ref. 1). The combined flow from the Missouri and Mississippi rivers averages approximately 1.12×10^{10} gallons per The Meramac has an average flow of 1.93×10^9 gallons per day. Withdraw from these rivers totals nearly 1.12 \times 10^9 gallons per day Because there is an abundance of potable surface water, (Ref. 7). ground water is not utilized as a source of drinking water. The bedrock for the region are divided into five discrete aguifers appropriately labeled one through five. Figure 4-3 shows the section view of the aguifers and Figure 4-4 shows the distribution. Group one, the Post-Maquoketa group, includes the strata above the Kimmswick Formation to the surface. Below this aquifer group lies the Maquoketa shale. Based on current information, the shale acts as an aquitard.

System	Series	Group	Pormation	Aquifer	Thick- ness (feet)	Dominant lithology	Water-bearing charact		
	Holocene		Alluvium1/		0-150	Sand, gravel, silt, and clay.	Some wells yield more than 2,000 gpm.		
Quaternary	Pleistocene		Loss Glacial till		0-110 0-55	Silt Pebbly clay and silt.	Essentially not water yielding		
	Missourian	· Pleasanton	'hdifferentiated		0-75	Shales, siltstones,	Generally yields very		
		Marmaton	. Undifferentiated	i	0-90	"dirty" sandstones.	small quantities of		
Pennsylvanian	Desmoinesian	Cherokee	Undifferentiated	1 1	0-200	coel beds and thin	water to wells.		
	Atokan		Undifferentiated	ļ		limestone beds.	Yields range from 0-10 apm.		
			Ste. Genevieve	1 [0-160	i			
		}	Formation .	! i		Argillacaous to			
	Heramecian	1	St. Louis Limestone	1	0-180 0-180	arenaceous limestone.	!		
	,		Sales Pormation Warsaw Formation	į į	0-110	+			
		 	Burlington-Keokuk	1 1	0-240	Cherty limestons	1		
Mississippian	Onetean		Limestone Fern Glen	1	0-105	Red linestone and shale.			
WIRE ISE I PP 141		<u> </u>	Pormation] [quantities of water		
	Kinderhookian	Chouteau	Undifferentiated] [0-122	Limestone, dolomitic	wells, Yields rang		
	ļ					limestone, shale, and siltatone.	from 5 to 50 gpm. Higher yields are		
	Upper	Sulphur Springs	Bushbarg Sandstone	1 1	0-60	Limescone and sandscone.	reported for this		
Devonian			Glen Park Linestone Grassy Creek Shale	1 1	0-50	Pissile, carbonaceous	interval locally.		
Silurian	 	 	Undifferentiated	4 1	0-200	shale, Cherty limestons.			
SITUPIAN		·	Undirrerentiated] [0-200	Cherty limestone.	!		
			Maquoketa Shale		0-163	Silty, calcareous or delomitic shale.	Probably constitutes configing influence water movement.		
	Cincinnatian	<u>i</u>	Cape Limestone	_ [0-5	Argillaceous limestone.	<u> </u>		
	1	}	Kimmewick	1	0-145	Massive limestons	!		
		!	Decorat Formation		0-50	Shale with incerbedded limestone.	Yields small to moder quantities of water		
	1	1	Plattin formation	2	0-240	Finely crystalline	from 3 to 50 gpm. Decorah Formation		
	Chempiesnian	į	Rock Leves Formation	4	0-93	Dolomite and limestone,			
	1	1	<u></u>	-		some shale.	probably acts as a		
	F	1	Joschim Dolomite	!	0-135	Primarily argillaceous dolomite.	confining bed local		
Ordovician		1	St. Peter Sandatone	1	0-160				
] , [Silty sandstone, cherty limestone grading	ties of water to we		
			Everton Formation		0-130	upward into quartzose sandatone.	Yields range from 10-140 gpm.		
		 	Powell Dolomite	1	0-150		Yields small to		
		1	Cotter Dolomite	4	0-320	Sandy and charty	large quantities of water to wells.		
	Canadian	1	Jefferson City Dolomite	4	0-225	dolomites and	Yields range from 1		
	1		Roubidoux Formation		0-177	i	to 300 gpm. Upper		
	1	1	Gasconade Dolomite]	0-280	7	part of equifer gro		
			Gunter Sandstone Hember	1			yields only small amounts of water to wells.		
	 		: Eminence Dolomite	+	0-172	 	Yields moderate to		
	·	<u></u>	Potosi Dolomita] [0-325	Cherty dolomites, silt-	large quantities of		
Cambrian	Upper	Elvins	Derby-Doerun	5	0-165	stones, sandstone,	water to wells.		
	1	1	Dolomite Davis Formation	-	0-150	and shale.	Yields range from 10 to 400 gpm.		
			Bonneterre formetto		245-385	1			
~	1	<u>!</u>	Lamotte Sandstone		235+	<u></u>	!		
Precambrian						Igneous and metamorphic rocks.	Does not yield water to wells in this ar		

MOUND STREET POWER STATION ST. LOUIS, MISSOURI

WASTE SITE TRACKING NO.: MO0579 PREPARED BY: JOHN C. PARKS

ECOLOGY AND ENVIRONMENT FIT DEC. 1987 SOURCE: WATER RESOURCES ST. LOUIS AREA MISSOURI



PREPARED BY: JOHN C. PARKS

SOURCE: WATER RESOURCES ST. LOUIS
AREA MISSOURI

FIGURE 4-4: MAJOR AQUIFER DISTRIBUTION ST. LOUIS COUNTY MISSOURI

Group two is the Ordovician age Kimmswick-Joachim aquifer. Near the top of this unit is the Decorah Formation, which probably acts as a confining bed composed of shales and interbedded limestones. The remaining lower three aquifers are separated primarily on the basis of unconformities. It is likely these aquifer groups, in descending order, the St. Peter-Everton, Powell-Gasconade and the Eminence-Lamotte are hydraulically connected.

Generally the bedrock aquifers of the region yield very small quantities of water; roughly 0 to 50 gallons per minute (gpm). The alluvial aquifers (Post-Maquoketa) completed along the Meramac, Mississippi, and Missouri rivers can provide much larger quantities. For example, the Weldon Springs Ordinance Plant production well yields almost 2,000 gpm. Other large yield industrial wells may be located near the rivers so that water would be drawn from these surface sources.

Figure 4-5 provides the specific capacities reported for wells completed in the river alluvium. Specific capacity is the rate of discharge from a well expressed as gallons per minute per feet of drawdown. Generally, the higher the specific capacity the higher the transmistivity and therefore the greater the susceptibility to contaminant migration.

City or outdivision	Owner	Well location	Tepth (feat)	well dismeter (inches)	Lega	Punning rate (April)	Duration of test (hours)	(aparety (aparet around,man)	Draw Seek (Seek)	Jempres
CLEY of De Sote		39-4-3add	s 10	!edra	Aug. 1934	-65	•	9.3	50	Potmas Dolemica (Group 3)
•	Burt Humor Hurosing Home	39-3-20 04	213	٠		26	٠	9.73	34	Liver part of Goormano Bulevita Laiseage Delevita (Groups o & 3)
	Robert Schroeder	39-5-31dba	285	٠	Jan. 1980	L a	ι	0.09	200	Jeffeteen City- Roubideen (Group 4)
	Blanche Combe Tratler Court	40- 1-12	1030	٠	1967	•0	•	1.33	43	Econoterro-Lametto (Group 5)
•	Jefferson County Memorial Benefici	40-4-17bde	750	5	1755	44	24	0.44	176	Cotter-Lawer part of Generalise (Group o)
•	Riceinstppi River Funl Ontp. River Comment	40-6-27ads	1000	•	•	62	٠	0.44	187	St. Poter-Upper part of Captempde (Groups 3 & 4)
• .	pro Chemical Co.	-1-6-18dac	190		1956	140	12	0.98	143	Et. Poter-Evertes (Gress 3)
City of Codar H111	٠	42-3-25400	902	•	May 1953	30	-	0.24	212	Cottor-Sminence (Groups = 6 5)
	Jofferson County Unior District No. 9	62-5-31bcc	1300	•	1967	130	24	1.63	40	Fost 11-Emphideum (Group 4)
	Securet Boy Scout	43-4-20ca	340	•	1930	50	24	0.44	113	Plattin-St. Puter (Groups 2 & 3)
Briar-Cliff Estatos	Located Sanii Sanity Co.	43-4-12 bd c	675	•	Sapt. 1939	23	24	0.21	107	Ejumovica-Everton (Groupe 2 & 3)
	Sabler State Park	45-3-2866d	:372	10	Aug. 1960	182	24	1.61	113	Josephie-St. Pater (Groupe 2 & 3)
-	C. Katemea	ua- 7- 20	655	٠	Feb. 1936	120	•	0.89	133	Ste. Geneviewe- Burlington (Group 1)
•	Atlan Province Co.	46-3-2844d	•11	•	Feb. 1961	13	3	0.07	200	Elemposch-St. Pocor (Groupo 2 & 3)
Lake St. Levis		47-2-27	1375	•	Her. 1970	140	•	0.76	193	Plattin-Amphidems (Groups 2, 3, 6.4)
City of O'Fallon	Well No. 3	47-3-20mds	1500	•	Oct. 1960	132	2	2.64	50	Rimmwish-Upper part of Gastomade (Groupe 2, 3, 6 4)
	Managente Chemisel Co.	47-3-23ecc	1397	10	APTEL 1967	183	74	0.53	348	Elementet-Enablishmum (Groups 2, 3, 6 4)
City of O'Fallon	well me. i	47-3-29aaa	933	•	Sept. 1940	**	24	0.25	221	Firmprice-St. Pacer (Groupe 2 & J)
Porcage des	Percaga des Sieus	48-6-13bcb	116	*1001001	ps Saver elle	500	-4	4	10.5	10 ecrees
\$ LONGS	Sime Wing	u7-a-7cbd	100	16		2000				
	Whistling Wing	47-4-11dbs	80			1230		e 5	14.0	
	Lindborg &	48-3-35cM	106	16		2269		80	26	
	Ore Fare	47-3-4adc	92			1690		103	16	
	Hermitage Club	47-3-12ada	100	16		1750		173	LO	
	Webfoot Club	47-3-12cdd	15	14		1900		63	23	32-ft screen
St Charles	St. Cherles	47-4-24	107							T=36,180 cubic font per dey per feet S=,0006
	Portage Forms	48-5-23dad	107	26	Sept. 1963	1160		103	11.4	
-	Mr. Asbe	44-4-23 004	102	18	l Fiver alluve 1963	1 40	2	160	3	32-ft acress. Well not pussed at steady rate.
	Mr. Smittle	48-5-17	**	12		600)7-ft acress
•	Trillege	-016	63	1.7		*00		47	13	
•	Weldon Springs Ordnance Plant	~5-3-18bcc	::7	15	:467	:650	•,			Aquader cost. 7-36,180 cubic foot per day mer foot 5-0,2
Valley Park	Valley Park)- (#dda)	•)	Teresec :5	Aug. 1749	504	24	72	,	i) fr of 18-inch acress
Valley Park	Weiley Perk	44-5-1 0dds 2	•3	1.0	July 1949	504	24	36	14	15 ft of 18-tack errors. Tield has increased to 67 gperft after treatment for tapecity loss.
Welley Park	Absorbent catton		+3		May 1957	500	12	63	•	15 (t of 16-inch across gravel pack.
Valley Park	Athland Chapters	34-5-17ebd	59	10	Oct. 1959 June 1966	503 554	:	102	3	15 fc of 10-tace ocross grave) pack.
Exclused	Elrinmod No. 1 Elrinmod No. 2	44-5-15	. 37	10	Dec. 1926	300 250	10	60 83	;	IS fr of 15-inch seroes
	Etriamed Ro. 2	44-5-15	+2	18	You. 1927	250	10	83	,	20 ft of 15-inch contrate screen.

MOUND STREET POWER STATION

ST. LOUIS, MISSOURI

WASTE SITE TRACKING NO.: MO0579 PREPARED BY: JOHN C. PARKS SOURCE: WATER RESOURCES ST. LOUIS
AREA MISSOURI

SECTION 5: POTENTIAL MIGRATION AND RECEPTORS

5.1 GROUND WATER ROUTE

It is highly probably that coal gasification wastes, if they are present on-site, are being released into local ground water. Since this preliminary assessment revealed no ground water use, there are no potential targets. If uses could be documented, then a potential target population could be identified.

5.2 SURFACE WATER ROUTE

Although the site is separated from the river by a levee, it is possible that materials potentially released into the ground water are being discharged into the Mississippi River. All city of St. Louis surface water intakes are approximately 9 miles upstream of the site. The only potential target populations are recreational uses, possible commercial fishing, and industrial intakes.

The oils contained in the basement may be hydraulically connected to the river by abandoned pipelines. This is the suspected migration route for oil that was the source of the three spills noted by the U.S. Coast Guard. Any oil releases to surface water would put the same targets as risk, that are at listed above.

5.3 AIR ROUTE

None of the potential wastes associated with this site have a potential for air release unless the facility is involved in a major structural fire. Because no PCB contaminants were detected in the oil, a fire would not cause a release of dioxin. A major fire could cause an air release of PAH materials, if the fire reached potential contamination areas. If an air release occurred it would target the majority of the St. Louis and or East St. Louis populations, depending on prevailing wind direction.

5.4 ON-SITE PATHWAY

If coal gasification wastes are present at this site, there is a great potential for direct contact with wastes. The population at risk would primarily involve local workers. Presently the E & E/FIT has no estimate of the size of this population. Direct contact with these wastes or contaminated soils could pose dermal, inhalation, and ingestion hazards.

SECTION 6: CONCLUSIONS

Based on the St. Louis Health Division and the E & E/FIT sampling there is no PCB contamination of the oils present in the basement of the former electric power plant. This statement is qualified in that the PCB detection limits were 1 ppm for the E & E/FIT data, and unknown for the St. Louis data. Concentrations of PCB below the 1 ppm detection limit are possible in the E & E/FIT samples. However, no evidence was uncovered suggesting that the oil in the basement should contain PCB. The initial concerns were raised based on the existence of large electric transformers located on site. The evidence suggests that the oil in these transformers was moved off-site. The most likely point of origin of the oil is the Apex Oil Terminal located several yards up-hill from the former electric power plant. This material is contained in a concrete basement and could be easily removed and sent to an oil recycling facility.

A search of historical documents provided information identifying this site as the location of the former Laclede Coal Gasification Plant. This facility may constitute the largest coal gas facility in Region VII.

SECTION 7: REFERENCES

- 1. United States Geological Survey Topographic Map, Granite City, Illinois.-Missouri., 7.5 Minute Quadrangle, 1968 revised.
- 2. Property Records contained in the E & E/FIT project file: TDD #F-07-8708-29 Mound Street Power Plant.
- 3. Log Book, for PA of the Mound Street Power Plant Site, Eric Hess, E & E/FIT, September 15 thru 17, 1987.
- 4. Survey of Town Gas and By-Product Locations in the U.S. (1880-1950), United State Environment Protection Agency, EPA/600/57-85/004, May 1985.
- 5.- Handbook on Manufactured Gas Plant Sites, Environmental Research and Technologies, Inc., Koppers Company, Inc., Volume I, September 1984.
- 6. Part 1 and 2 1/2 hours transcribed taped interview with Eugene Hingtgen, Assistant Superintendent of the Key City Gas Plant, from 1946-1956. Interviewees: Eric Hess, Ted Faile, and John H. Parks, E & E/FIT, March 23, 1987.
- 7. City of St. Louis Department of Health and Hospitals, Division of Health, Project Files on Mound Street Power Plant.
- 8. Ambient Water Quality Criteria for Polynuclear Aromatic Hydrocarbons, United State Environment Protection Agency Document PB81-117806, October 1980.
- 9. Expanded Site Investigation of the Peoples Natural Gas Site, Dubuque, Iowa, Project F-07-8701-20/FIA0176XA, September 1987.
- 10. Alford-Stevens, Ann L. Analyzing PCB, Environmental Science and Technologies, 20:12:1194-1199, 1986.
- 11. Nemerow, Nelson, L. <u>Industrial Water Pollution</u>. Addison Wesley Publishing Co., Inc., Reading Massachusetts, 1971.
- 12. Quality Criteria for Water, United State Environment Protection Agency Washington D.C., Stock #055-001-01049-4, 1976.
- 13. Soil Survey of St. Louis County, Missouri, Soil Conservation Service, United State Department of Agriculture, 1979.
- 14. Missouri Geological Survey and Water Resources, Stratigraphic Succession in Missouri, Volume XL, 1961.

Appendix A EPA Form 2070-12

Mound St. Power Plant

I. IDENTIFICA	TION
01 STATE 02 SIT	E NUMBER

PART	PRELIMINARY 1 - SITE INFORMA			CM	UZ SITE NUMBER	
II. SITE NAME AND LOCATION				<u> </u>	- 	
01 SITE NAME (Legal, common, or descriptive name of site)		02 STREE	T. ROUTE NO., OF	SPECIFIC LOCATION IDENTIFIER		
Mound Street Power Plant			Number 2 Mound Street			
03 СПҮ		1	05 ZIP CODE		07 COUNTY 08 CONG	
St. Louis		Mo	63101	St. Louis	CODE DIST	
09 COORDINATES LATITUDE	ONGITUDE			<u> </u>		
38° 38' 00"01' 090°		1				
10 DIRECTIONS TO SITE (Starting from nearest public med)		ــــــــــــــــــــــــــــــــــــــ				
Take interstate 70 east from k Take the next exit, Memorial I Mound St. and turn right onto	Dr., north.	Travel	on Memo	rial Dr. several	blocks to	
III. RESPONSIBLE PARTIES						
01 OWNER (# Impure)			(Busness, making,			
Herman Gellman, Pres. Mound St	. corp	5020	North H	all St.		
03 CITY		1 3	05 ZIP CODE	06 TELEPHONE NUMBER		
St. Louis		1:0	63147	(314) 2316077	<u></u>	
07 OPERATOR (If shown and different from earners		08 STREE	(Business, meding,	residential)		
none						
09 CITY		10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER		
	,			()		
13 TYPE OF OWNERSHIP (Check BAB)		1				
X A PRIVATE B FEDERAL	(Agency name)		C. STAT	TE DOCUMTY DEM	UNICIPAL	
I F OTHER	Heaty)		_ E G UNK	NOWN		
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check of their appl						
A RCRA 3001 DATE RECEIVED HONTH DAY YEAR		LED WAST	SITE ICERCLA TO	DATE RECEIVED:	DAY YEAR IS C. NONE	
IV. CHARACTERIZATION OF POTENTIAL HAZARI						
YES DATE 9 17 37				(Seemb)	CONTRACTOR	
	NTRACTOR NAME(S):	Ecolo	gy & Env	<u>ironment, Inc.</u>		
G2 SITE STATUS (Check one)	03 YEARS OF OPE					
□ A. ACTIVE X□ B. INACTIVE □ C. UNKNOWN		OX. 19		83 🔃 unknov	'n	
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNO		DECEMBER 15	AA ENGIN	g izw		
The oil in the former power pl the former coal gasification p	ant basement plant contain	may c PAH,	ontain P cyanide,	CB. The wastes a metals, tolulene	issociated wite and xylene.	
os description of Potential Hazard To environment a The potential PCB, tolulene, xy cyanides, and metals have acut concentrations. Contact, inha contaminants. V. PRIORITY ASSESSMENT	lene, PAH co ce and chroni	c toxi	cities a	t relatively low	environmental	
01 PRIORITY FOR INSPECTION (Check and. If high or medium is check	nd. complete Parl 2 - Waste Info	rments and Par	3 - Description of He	transport Conditions and Incidental	· 	
☐ A, HIGH XXB. MEDIUM	C. LOW	· everlaght began	D. NON	NE Vision action hoosing, complete current discr	ellor formi	
VI. INFORMATION AVAILABLE FROM						
DI CONTACT	02 OF (Agenty/Organ				03 TELEPHONE NUMBER	
Dauletta Enames Jestte	Region Su		d ·		913 236-2856	
Pauletta France-Isetts 04 PERSON RESPONSIBLE FOR ASSESSMENT	REGION SU		NIZATION	07 TELEPHONE NUMBER	OS DATE	
Eric Hess	Contracto	r Eco	logy&Env	ir. 1913) 432-9361	1,4,08	

Ω	-	
7		PA

			Plant		
I. IDENTIFICATION					
01 STATE 02 SITE NUMBER					

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS 01 PHYSICAL STATES (Check as max acopy) A SOLID B SUBSTANCE NAME CUBIC YARDS UNKNOWN OLW OILY WASTE UNKNOWN FUEL CIT OF CYCLE UNKNOWN FUEL CIT OF CYCLE OLW OILY WASTE	
A SOLID E SLURRY Must be independent Tons D B CORROSIVE D F. INFECTIOUS CUBIC YARDS U.N.K.NOWN D. PERSISTENT D. H. IGNITABLE III. WASTE TYPE CATEGORY SUBSTANCE NAME O1 GROSS AMOUNT O2 UNIT OF MEASURE O3 COMMENTS SLU SLUDGE U.N.K.NOWN Fue? Cil Or Cran	S J. EXPLOSIVE S K. REACTIVE S L. INCOMPATIBLE S M. NOT APPLICABLE
NO. OF DRUMS NO.	
CATEGORY SUBSTANCE NAME 01 GROSS AMOUNT 02 UNIT OF MEASURE 03 COMMENTS SLU SLUDGE UNKNOWN Coal Tar OLW OILY WASTE UNKNOWN FUEl Cil or tran	
SLU SLUDGE UNKNOWN Coal Tar OLW OILY WASTE UNKNOWN Fuel Cil or tran	
olw Olly WASTE unknown Fuel Cil or tran	
SOL SOLVENTS	and tolene
	and tolene
PSD PESTICIDES	and tolene
occ other organic Chemicals unknown Coal tar xvlene	
IOC INORGANIC CHEMICALS UNKNOWN Cyanide salts	
ACD ACIDS	
BAS BASES	
MES HEAVY METALS UNKNOWN COal tar Associa	iteu
IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cred CAS Mumbers)	O6 MEASURE OF
	CENTRATION OF CONCENTRATION
SLU Coal Tar 800745-2 unknown unkno SLU Benzo (A) pyrene 50323 unknown unkno	
SLU Benzo (A) pyrene 50328 unknown unkno OCC Xylene 1330207 unknown unkno	
L COENTOUTS ANNOUNCE	
	tected 1 ppm detec
MES Lead 74439921	'
MES Arsenic	
IOC Cyanide 57125	
V. FEEDSTOCKS (See Accordant for CAS Murroura) None	
CATEGORY D1 FEEDSTOCK NAME 02 CAS NUMBER CATEGORY 01 FEEDSTOCK NAME	02 CAS NUMBER
FDS FDS	
VI. SOURCES OF INFORMATION (Cite appealer references, e.g., state that, service energies, reports)	
E&E/FIT Files EP&R Files Wissouri Department of Health and Hospitals	

I. IDENTIFICATION			
	O1 STATE	02 SITE NUMBER	

IN MAZAROUS CONDITIONS AND INCOSETYS OF A CROQUENTER CONTAMINATION OF A CROQUENTER CONTAMINATION OF A CROQUENT CONTAMINATION OF A CROQUENT CONTAMINATION OF CONTAMINATION POTENTIAL Y AFFECTED UNKNOWN OF CONTAMINATION POTENTIAL Y AFFECTED UNKNOWN OF CONTAMINATION POTENTIAL Y AFFECTED UNKNOWN OF CONTAMINATION OF ARE ASSOCIATED OF CONTAMINATION OF CONTAMINATION OF ARE ASSOCIATED OF CONTAMINATION OF A CONTAMINAT	WEPA ,		INARY ASSESSMENT AZARDOUS CONDITIONS AND INCIB	ENTS	
O1 TAB SURFACE WATER CONTAMINATION O1 TO STANDARD WATER CONTAMINATION O1 TO CONTAMINATION OF ANY O1 TO DE DASCRATO OF THE OTHER OT	II. HAZARDOUS CONDITION	S AND INCIDENTS			
OIL from site may have been released into the Mississippi River. If ground water contamination exists, it may allow release of contaminants into the surface water through surface water recharge. OIL C CONTAMINATION OF AIR OR				POTENTIAL	CALLEGED
OIL from site may have been released into the Mississippi River. If ground water contamination exists, it may allow release of contaminants into the surface water through surface water recharge. OIL C CONTAMINATION OF AIR OIL CONTAMINATION OF SOIL CONTAMINATION OF SOIL UNKNOWN OIL CONTAMINATION OIL CONTAMINATIVE DESCRIPTION OIL CONTAMINATION OIL CONTAMINATION OIL CONTAMINATION OIL CONTAMINATIVE DESCRIPTION OIL CONTAMINA	Coal tar wastes	s are potentially b	uried in unlined pits or	stored in leak	ing containers
OIL from site may have been released into the Mississippi River. If ground water contamination exists, it may allow release of contaminants into the surface water through surface water recharge. OIL C CONTAMINATION OF AIR OIL CONTAMINATION OF SOIL CONTAMINATION OF SOIL UNKNOWN OIL CONTAMINATION OIL CONTAMINATIVE DESCRIPTION OIL CONTAMINATION OIL CONTAMINATION OIL CONTAMINATION OIL CONTAMINATIVE DESCRIPTION OIL CONTAMINA	·				
Gil from site may have been released into the Mississippi River. If ground water contamination exists, it may allow release of contaminants into the surface water through surface water recharge. 01 C CONTAMINATION OF AIR 02 COBSERVEDIDATE	01 XB. SURFACE WATER CO	ONTAMINATION		.) EXPOTENTIAL	☐ ALLEGED
CONTAMINATION OF AIR OR CONSERVED IDATE 9-17-07	Oil from site n	lav have been relea	sed into the Mississippi	River. If gro	und water
ON ARRATIVE DESCRIPTION The basement of the former power plant contains several thousand gallons of potentially flamable oil. ON EDIRECT CONTACT ON POPULATION POTENTIALLY AFFECTED UNKNOWN ON ARRATIVE DESCRIPTION DI X E DIRECT CONTACT ON POPULATION POTENTIALLY AFFECTED UNKNOWN ON ARRATIVE DESCRIPTION Soil contamination from coal gasification wastes is likely. Soil contamination could allow direct contact with wastes. ON X F CONTAMINATION OF SOIL UNKNOWN ON ARRATIVE DESCRIPTION Soil contamination from coal gasification wastes is likely. ON ARRATIVE DESCRIPTION DIT G DRINKING WATER CONTAMINATION ON ARRATIVE DESCRIPTION DIT IN WORKER EXPOSURE MURRY UNKNOWN ON ARRATIVE DESCRIPTION ON ARRATIVE DESCRIPTION WORKER SPOTENTIALLY AFFECTED: ON ARRATIVE DESCRIPTION WORKER'S POTENTIALLY AFFECTED: ON ARRATIVE DESCRIPTION WORKER'S POTENTIALLY AFFECTED: ON ARRATIVE DESCRIPTION ON ARRATIVE DESCRIPTION WORKER'S POTENTIALLY AFFECTED: ON ARRATIVE DESCRIPTION ON ARRAT	contamination e	exists, it may allow	w release of contaminants	into the surf	ace water
C1 XO FREEEXPLOSIVE CONDITIONS C3 POPULATION POTENTIALLY AFFECTED UNKNOWN The basement of the former power plant contains several thousand gallons of potentially flamable oil. C1 Xe direct contact C3 POPULATION POTENTIALLY AFFECTED UNKNOWN C3 COSSERVED DATE 9=17-87 / XPOTENTIAL ALLEGED C3 POPULATION POTENTIALLY AFFECTED UNKNOWN C4 NARRATIVE DESCRIPTION Soil contamination from coal gasification wastes is likely. Soil contamination or SOIL UNKNOWN C3 AREA POTENTIALLY AFFECTED UNKNOWN C4 NARRATIVE DESCRIPTION Soil contamination from coal gasification wastes is likely Soil contamination from coal gasification wastes is likely O1 XF CONTAMINATION OF SOIL UNKNOWN C3 AREA POTENTIALLY AFFECTED OA NARRATIVE DESCRIPTION Soil contamination from coal gasification wastes is likely O1 C3 DRINKING WATER CONTAMINATION O3 POPULATION POTENTIALLY AFFECTED NORP O3 NORKERS POTENTIALLY AFFECTED OA NARRATIVE DESCRIPTION D1 C3 WORKER EXPOSURE/MAURY O3 WORKERS POTENTIALLY AFFECTED: O4 NARRATIVE DESCRIPTION WORKER SPOTENTIALLY AFFECTED: O5 NARRATIVE DESCRIPTION WORKER SPOTENTIALLY AFFECTED: O5 NARRATIVE DESCRIPTION O5 NARRATIVE DESCRIPTION WORKER SPOTENTIALLY AFFECTED: O6 NARRATIVE DESCRIPTION O7 NARRATIVE DESCRIPTION O7 NARRATIVE DESCRIPTION O7 NARRATIVE DESCRIPTION WORKER SPOTENTIALLY AFFECTED: O7 NARRATIVE DESCRIPTION O7) DOTENTIAL	C ALLEGED
C1 XO FIREEXPLOSIVE CONDITIONS 23 POPULATION POTENTIALLY AFFECTED UNKNOWN O4 NARRATIVE DESCRIPTION The basement of the former power plant contains several thousand gallons of potentially flamable oil. 21 XE DIRECT CONTACT 03 POPULATION POTENTIALLY AFFECTED UNKNOWN O4 NARRATIVE DESCRIPTION Soil contamination from coal gasification wastes is likely. Soil contamination could allow direct contact with wastes. 21 XF CONTAMINATION OF SOIL O4 NARRATIVE DESCRIPTION Soil contamination from coal gasification wastes is likely. O1 C6 DRINKING WATER CONTAMINATION D7 INKING WATER CONTAMINATION O4 NARRATIVE DESCRIPTION WORKER EXPOSURE/INJURY UNKNOWN O4 NARRATIVE DESCRIPTION WORKER SPOTENTIALLY AFFECTED: O4 NARRATIVE DESCRIPTION WORKER STORMAN OF SOIL O4 NARRATIVE DESCRIPTION O5 POPULATION POTENTIAL O6 DESCRIPTION O6 NARRATIVE DESCRIPTION O6 NARRATIVE DESCRIPTION O6 NARRATIVE DESCRIPTION O7			04 NAMESTIVE DESCRIPTION		
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Col Separation potentially affected Unknown of Narrative Description Soil contamination from coal gasification wastes is likely. Soil contamination could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow direct contact with wastes. Of Separation potential could allow					
Soil contamination from coal gasification wastes is likely. Soil contamination of soil unknown of contact with wastes. 31 XF CONTAMINATION OF SOIL UNKNOWN OF ANABRATIVE DESCRIPTION Soil contamination from coal gasification wastes is likely 32 COBSERVED (DATE:) POTENTIAL ALLEGED 33 AREA POTENTIALLY AFFECTED: 100P Of NARRATIVE DESCRIPTION Soil contamination from coal gasification wastes is likely 31 CG DRINKING WATER CONTAMINATION Of COAL GASTANDER OF ANABRATIVE DESCRIPTION Drinking water for St. Louis is obtained from surface water intakes over three miles upstream. 34 CG DRINKING WATER CONTAMINATION Of COAL GASTANDER OF COAL			plant contains several th	ousand gallons	of poten-
Soil contamination could allow direct contact with wastes. Oi		LY AFFECTED UNKNOWN		POTENTIAL	ALLEGED
O4 NARRATIVE DESCRIPTION Soil contamination from coal gasification wastes is likely O1 G DRINKING WATER CONTAMINATION O2 GOBSERVED (DATE:) POTENTIAL ALLEGED O3 POPULATION POTENTIALLY AFFECTED: NOTE O4 NARRATIVE DESCRIPTION Drinking water for St. Louis is obtained from surface water intakes over three miles upstream. O1 G H WORKER EXPOSURE/NULRY UNKNOWN O2 GOBSERVED (DATE:) XMOTENTIAL ALLEGED O3 WORKERS POTENTIALLY AFFECTED: O4 NARRATIVE DESCRIPTION Workers in the former power plant and at the Apex Oil St. Louis terminal (located on the former coal gas site) are not isolated from potential soil contamination. O1 G I POPULATION EXPOSURE/NAURY O2 GOBSERVED (DATE:) POTENTIAL ALLEGED O4 NARRATIVE DESCRIPTION GOBSERVED (DATE:) POTENTIAL GALLEGED O4 NARRATIVE DESCRIPTION					
Soil contamintion from coal gasification wastes is likely 01 G DRINKING WATER CONTAMINATION	31 X F CONTAMINATION O	ECTED) X POTENTIAL	_ ALLEGED
O3 POPULATION POTENTIALLY AFFECTED:	Soil contaminti		ication wastes is likely		
Drinking water for St. Louis is obtained from surface water intakes over three miles upstream. O1 St. Worker exposure/injury unknown O2 OBSERVED (DATE:	01 G DRINKING WATER CO	ONTAMINATION) DPOTENTIAL	☐ ALLEGED
O3 WORKERS POTENTIALLY AFFECTED: O4 NARRATIVE DESCRIPTION Workers in the former power plant and at the Apex Oil St. Louis terminal (located on the former coal gas site) are not isolated from potential soil contamination. O1 D1 POPULATION EXPOSURE INJURY O2 DOBSERVED (DATE:) POTENTIAL DALLEGED O4 NARRATIVE DESCRIPTION	Drinking water	for St. Louis is o	btained from surface wate	r intakes over	three •
Of Narrative Description Workers in the former power plant and at the Apex Oil St. Louis terminal (located on the former coal gas site) are not isolated from potential soil contamination. Oi Di Population exposure/injury Of Description Of Narrative Description Of Narrative Description Of Narrative Description	01 TV H. WORKER EXPOSUE	RE/INJURY unichown	02 □ ORSERVED (DATE:) VVPOTENTIAL	□ ALLEGED
on the former coal gas site) are not isolated from potential soil contamination. O1 DI POPULATION EXPOSURE/INJURY O3 POPULATION POTENTIALLY AFFECTED: O4 NARRATIVE DESCRIPTION O5 DO D1	03 WORKERS POTENTIALLY	AFFECTED:	04 NARRATIVE DESCRIPTION		
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION	Workers in the on the former o	former power plant coal gas site) are	and at the Apex Oil St. not isolated from potenti	Louis terminal al soil contam	(located ination.
none observed) DOTENTIAL	ALLEGED .
	none observed				·

L.	IDENT	IFICATION
01	STATE	02 SITE NUMBER

PART 3 - DESCRI	PRELIMINARY ASSESSMENT IPTION OF HAZARDOUS CONDITIONS AND INCIDENT:	s in STATE 02	SIE NUMBER
II. HAZARDOUS CONDITIONS AND INCIDENT	TS (Continued)		
01 T J DAMAGE TO FLORA 04 NARRATIVE DESCRIPTION	02 OBSERVED (DATE:)	D POTENTIAL	ALLEGED
none observed			
01 C. K. DAMAGE TO FAUNA D4 NARRATIVE DESCRIPTION (INClude nome(a) of species	02 OBSERVED (DATE:)	□ POTENTIAL	□ ALLEGED
none observed			
D1 & L. CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION	02 🗆 OBSERVED (DATE:)	Ø POTENTIAL	C ALLEGED
If materials are entering taminants.	surface water, benthic organisms cou	uld bioaccum	nulate con-
01 X M UNSTABLE CONTAINMENT OF WASTES	· · · · · · · · · · · · · · · · · · ·	F POTENTIAL	T ALLEGED
Oils stored in open pools be stored in unlined pits.	in basement. (observed). Coal tar	wastes, if	present, may
01 T N DAMAGE TO OFFSITE PROPERTY 04 NARRATIVE DESCRIPTION	02 C OBSERVED (DATE:)	D POTENTIAL	□ ALLEGED
none observed			
01 & O. CONTAMINATION OF SEWERS, STORM	DRAINS, WWTPs 02 C OBSERVED (DATE	POTENTIAL	☐ ALLEGED
O4 NARRATIVE DESCRIPTION Sewers adjacent to site co	ontain several feet of oil.		
01 X P ILLEGAL/UNAUTHORIZED DUMPING 04 NARRATIVE DESCRIPTION	02 C OBSERVED (DATE:)	₹ POTENTIAL	ALLEGED
Oil may be the result of u	unreported spills from the Apex facil	lity.	
05 DESCRIPTION OF ANY OTHER KNOWN, POTI	ENTIAL, OR ALLEGED HAZARDS		
None observed			
III. TOTAL POPULATION POTENTIALLY AFF	ECTED: _unknown		
IV. COMMENTS			
Currently the site is cons The former coal gas site s	idered to involve only the oil in the should be included in consideration o	e former po of this site	wer plant.
V. SOURCES OF INFORMATION (CON MACCOLE PARTY	Pances, e. g., state fles, earnote analysis, resorts)		
E&E/FIT files. EP&R files St. Louis Department of He	alth and Hospital files		